

ESTTA Tracking number: **ESTTA699538**

Filing date: **10/01/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92062185
Party	Defendant Church & Dwight Co., Inc.
Correspondence Address	CHURCH & DWIGHT CO INC 500 CHARLES EWING BOULEVARD EWING, NJ 08628 UNITED STATES
Submission	Other Motions/Papers
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Date	10/01/2015
Attachments	MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER 10 1 15.pdf(74120 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

_____	:	Cancellation No.: 92062185
Petitioner	:	Mark: RHINO
	:	Reg. No. 3889569
v.	:	Issued: September 4, 1990
	:	and
CHURCH & DWIGHT CO., INC.,	:	Reg. No.: 3873284
	:	Issued: February 24, 1998
Respondent	:	
_____	:	

MOTION FOR AN EXTENSION OR SUSPENSION OF TIME TO FILE AN ANSWER

Church & Dwight Co., Inc., Respondent in the above captioned matter, hereby requests that the Board grant it an extension of time to file an Answer or suspend the time to file an Answer in the above captioned Cancellation action.

Pursuant to TBMP 527.02 and 37 C.F.R. §11.18 and Federal Rule of Civil Procedure 11(c)(2), Respondent has served a motion upon Petitioner's counsel providing him the opportunity to withdraw the Petition to Cancel. Accordingly, Respondent may not need to file an Answer, or if Petitioner has not withdrawn the Petition after the 21 day safe harbor time has passed a motion for sanctions will be filed rather than an Answer. Proceeding with an extension of time or suspension of time for the Answer deadline will reduce costs to Respondent and unnecessary filings with the Board.

Respondent respectfully requests that the Board suspend or extend the due date for the Answer until such time as the Board is notified of the withdrawal of the Petition to Cancel or a filed motion pursuant to TBMP §57.02 is ruled upon by the Board.

For the foregoing reasons, favorable action on this motion is respectfully requested.

CHURCH & DWIGHT CO., INC.

Date: October 1, 2015

By: /Brooks R. Bruneau/
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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this Motion for Extension or Suspension of Time to File an Answer was electronically filed with the Trademark Trial and Appeal Board this 1st day of October, 2015.

/Brooks R. Bruneau/

(Signature)

October 1, 2015

(Date of Signature)

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of Respondent's Motion for an Extension of Time to File an Answer was served upon counsel for Petitioner, via First Class Mail, postage prepaid, on this 1st day October, 2015, addressed as follows:

Stephen L. Baker, Esq.
BAKER AND RANNELLS PA
575 ROUTE 28
RARITAN, NJ 08869-1354

CHURCH & DWIGHT CO., INC.

Date: October 1, 2015

BY: /Brooks R. Bruneau/
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